

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**IN THE MATTER OF THE SEARCH OF  
A 2015 FORD EXPLORER BEARING  
VEHICLE IDENTIFICATION NUMBER  
(VIN): 1FM5K8D86FGB65741 LOCATED  
AT COPART, 1746 US ROUTE 60,  
HURRICANE, WV 25526**

Case No. 3:23-mj-00089

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Ryan Amstone, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been employed as a postal inspector with the U.S. Postal Inspection Service since October 2003. My duties include the investigation of crimes that involve the U.S. Postal Service and the U.S. mail. These crimes include mail fraud, mail theft, identity theft, narcotics trafficking, burglaries and robberies of post offices, and dangerous mail investigations.

2. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. This affidavit is made in support of an application for a search warrant to search a 2015 Ford Explorer bearing Vehicle Identification Number (VIN): 1FM5K8D86FGB65741 (hereinafter referred to as the SUBJECT VEHICLE), for evidence of violations of Title 18, United States Code, Section 1341 (Mail Fraud), Title 18, United States Code, Section 1343 (Wire Fraud), and Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud and Mail Fraud). Based upon the following information, there is probable cause to believe that the SUBJECT VEHICLE currently contains evidence, fruits, and instrumentalities of these crimes as described below and in Attachment B. I have set forth the facts that are necessary to

establish probable cause to believe that evidence, fruits, and instrumentalities of these violations are present in the SUBJECT VEHICLE.

**PROBABLE CAUSE**

4. In May 2022, I was contacted by Special Agent Brad Dumire (SA Dumire) who is employed as a fraud investigator with the West Virginia Offices of the Insurance Commissioner, where he has worked since 2003. His duties include the investigation of insurance fraud and related crimes.

5. On November 12, 2020, SA Dumire received an investigative referral involving Scott Pifer for allegations of workers' compensation fraud. The referral alleged that Mr. Pifer fraudulently collected workers' compensation benefits for a work-related injury that occurred on October 19, 2017, in or near Salem, WV.

6. As SA Dumire investigated this allegation, he researched the National Insurance Crime Bureau (hereinafter referred to as NICB) which revealed a pattern of insurance claims with Mr. Pifer and other family members/associates as the claimants or involved parties. The searches resulted in the discovery of numerous insurance claims for seven family members or associates over a 24-year period. The identified claims included 26 separate insurance companies with settlements totaling more than \$340,000.00.

7. As part of an investigative analysis, SA Dumire initiated a review of prior referrals to the West Virginia Offices of the Insurance Commissioner, Office of Inspector General, Special Investigations Division (hereinafter referred to as WV OIG-SID). The review revealed allegations of fraud committed by Scott Pifer, as well as Earl McCauley and Natalie McCauley, also known as Natalie Pifer. On October 30, 2018, WV OIG-SID received a referral

in reference to Earl and Natalie McCauley alleging that Earl and Natalie McCauley filed a false insurance claim by misrepresentation of an insurance policy application.

8. Subsequent investigation revealed that Earl and Natalie McCauley are married, and Natalie is the daughter of Scott Pifer. Further research and investigation revealed that Scott Pifer, Earl McCauley, Natalie McCauley (Pifer) and six other family members and associates, combine for a total of 164 insurance claims over the same 24-year period included in the initial review. Earl and/or Natalie McCauley (Pifer) were involved in seven insurance claims. The research and analysis revealed that many of these insurance claims were “flagged” by NICB for suspicions of insurance fraud. In addition, an organized pattern was observed in the timing, consistency, and type of insurance claims that were filed.

9. As part of the investigation, SA Dumire and I reviewed several insurance claims filed by Earl and Natalie McCauley, all of which occurred in the Northern District of West Virginia. At the completion of the review, SA Dumire and I interviewed the McCauley’s on May 3, 2023, at their residence in Elkins, WV. The following paragraphs summarize each of the fraudulent claims, and the interview summary.

10. Earl and Natalie McCauley filed an insurance claim for an incident that occurred on October 19, 2018. This claim involved the total loss of a 2015 Jeep Grand Cherokee VIN: 1C4RJFAG8FC168432, owned by Amanda and Colen Carr, of Petersburg, WV, and insured with Geico Insurance. The claim also involved a 2012 Ford Fusion, VIN #: 3FAHP0HA1CR171488, owned by Earl J. McCauley, and insured with Progressive Insurance. When interviewed by investigators, Natalie McCauley stated, “That was a legitimate accident.” Natalie stated that she was traveling near Petersburg, WV when she was involved in an accident with a woman named Amanda Carr. Natalie stated that her Ford Fusion was insured by

Progressive Insurance through Earl McCauley Sr. (her late father-in-law). Earl then explained that they paid Earl Sr. monthly cash payments for the insurance policy, and that Earl Sr. was responsible for paying the insurance company directly. Natalie presented proof of this policy information to responding law enforcement and to Amanda Carr on the date of the accident, believing the policy was in good standing. Natalie later learned the policy was cancelled due to non-payment by Earl Sr. Upon discovering that the policy was canceled, Natalie confessed that she attempted to reinstate the canceled policy so that she could file a claim for damages to her vehicle. Natalie confessed that the day following the accident, she electronically submitted a false “Statement of No Loss.” Natalie confessed that she submitted the false statement by falsely purporting herself to be Earl McCauley.

11. Earl and Natalie McCauley filed an insurance claim for an incident that occurred on April 22, 2019. This claim involved the total loss of a 2005 Dodge Durango, VIN#: 1D8HB58D15F625224, insured with Liberty Mutual. When interviewed by investigators, the McCauley’s stated that the vehicle was “not running right,” citing mechanical problems. Natalie stated that prior to the date of loss, she was nearly rear-ended by another vehicle after the Dodge Durango suddenly stopped in the middle of the road without warning. Both individuals claimed that the mechanical failures were never properly fixed despite repeated attempts. Earl confessed that he intentionally crashed the vehicle to obtain insurance money, and to get rid of the vehicle. Earl confessed that he intentionally ran the vehicle into a tree, knowingly causing enough damage to the vehicle to result in a total loss. Both individuals confessed to filing a false insurance claim and providing false information to the insurer. Both individuals further confessed that the false claim resulted in various mailings from the insurance company,

including a check that was mailed to the lienholder that satisfied the remaining balance owed on the vehicle.

12. Earl and Natalie McCauley filed an insurance claim for an incident that occurred on March 2, 2022. This claim involved the total loss of a 2014 GMC Sierra K1500 SLT, VIN #: 3GTU2VEC4EG445047, insured with Esurance. When interviewed by investigators, Earl McCauley stated he was driving to work on the date of loss and was traveling near Ellamore, WV, at which time he fell asleep and ran off the road. The result was “slight damage” on the passenger side of the truck. Earl confessed that he continued traveling on the same road, traveling less than one mile, at which time he intentionally crashed the truck into a tree. Earl and Natalie both confessed that a false insurance claim was filed with Esurance, falsely reporting that the crash was legitimate and accidental. Both individuals confessed that the intentional crash and false claim was an attempt to secure enough money to pay the vehicle loan in full. Both individuals further confessed to providing false information throughout the claim process resulting in various mailings from the insurance company that supported the processing and settling of the false claim. As a result, a settlement check was mailed to the lienholder that satisfied the remaining balance owed on the truck.

13. On September 6, 2023, Earl and Natalie McCauley were indicted by a grand jury in the Northern District of West Virginia. They were charged with four counts of mail fraud in violation of Title 18 USC 1341.

14. On November 7, 2023, SA Dumire received notice from NICB that Earl and Natalie McCauley filed an insurance claim with Esurance regarding a motor vehicle collision that occurred on November 5, 2023, involving the SUBJECT VEHICLE. Initial investigation revealed that the damage to the vehicle was allegedly sustained when the vehicle hit a deer, and

that the reported damage was “likely minor.” On November 28, 2023, SA Dumire received the insurance claim file which revealed that the vehicle damage was not “minor” as initially reported; but that the vehicle was determined to be a total loss after an estimated \$12,892.03 in damage was discovered. The file included settlement documentation stating that Esurance would settle the insurance claim in the amount of \$13,950.30. The settlement check was to be mailed to the lienholder: OneMain Financial, located in Evans, IN.

15. Investigation also revealed that the McCauley’s submitted false statements on the initial application for the insurance policy for the SUBJECT VEHICLE. Specifically, when asked if either driver was involved in “Any accidents, major violations or claims in the last 5 years?”, the McCauley’s answered “No.” The application was dated August 18, 2020, and the information was successfully used in the purchase of the insurance policy. Furthermore, the McCauley’s did not have insurance on the SUBJECT VEHICLE until August 18, 2023, despite purchasing the vehicle on February 24, 2021.

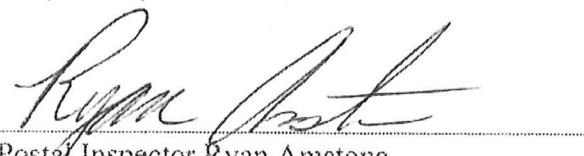
16. The SUBJECT VEHICLE is currently located at Copart, 1746 US Route 60, Hurricane, WV 25526, which is in the Southern District of West Virginia. Copart is an online car auction that features used, wholesale, and salvaged vehicles.

17. Based on SA Dumire’s training and experience, he knows that vehicles contain an Electronic Data Recorder (EDR) that record data such as driver’s belt switch circuit status, passenger belt switch status, brake switch status, “Maximum SDM Recorded Velocity Change,” air bag deployment, and other related recordings that are captured when a vehicle senses a crash or similar event. Individuals who purposely stage motor vehicle collisions for the purpose of filing false insurance claims do so by verbal misrepresentation of the crash facts contrary to the empirical evidence recorded by the EDR.

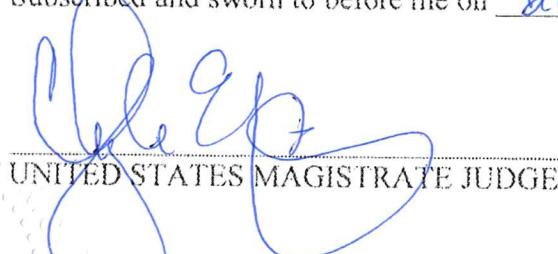
**CONCLUSION**

18. Based on the aforementioned information, your affiant respectfully submits that there is probable cause to believe violations of 18 USC Section 1341 (Mail Fraud), Section 1343 (Wire Fraud) and Section 1349 (Conspiracy to Commit Mail or Wire Fraud), have been committed and that evidence of those violations is located in the SUBJECT VEHICLE, specifically the EDR. This evidence, listed in Attachment B to this affidavit, which is incorporated herein by reference, is contraband, the fruits of crime, or things otherwise criminally possessed, or property which is or has been used as the means of committing the foregoing offenses. Based upon the foregoing, your affiant respectfully requests that this Court issue a search warrant for the SUBJECT VEHICLE, more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

Respectfully submitted,

  
Postal Inspector Ryan Amstone  
U.S. Postal Inspection Service

Subscribed and sworn to before me on December 18, 2023.

  
UNITED STATES MAGISTRATE JUDGE